

UNITED STATES BANKRUPTCY COURT
Western District of Missouri

In re:)
)
Mary Crooks,)
)
Debtor,)
) Case No. 05-71032
)
) Chapter 13
)
Richard V. Fink,)
) DEBTOR'S ANSWER TO
Movant,) MOTION TO DENY CONFIRMATION
)
vs.)
)
Mary Crooks,)
)
Respondent.)
) Castle Law Offices
) 818 Grand Blvd.
) Ste. 700
) Kansas City, MO 64106

DEBTOR'S ANSWER TO MOTION TO DENY CONFIRMATION

Comes Now Debtor, Mary Crooks, by and through her attorney of record, Jason C. Amerine, and answers the Motion to Deny Confirmation as follows:

1. That on or about December 15, 2005, the Chapter 13 Trustee filed a Motion to Deny Confirmation because Debtor has not commenced making her plan payment.
2. That Debtor intends to convert to a Chapter 7 bankruptcy.

WHEREFORE, Debtor respectfully requests this Court enter an order denying Trustee's Motion to Deny Confirmation; and for such other and further relief as this Court deems necessary and proper.

RESPECTFULLY SUBMITTED,

Castle Law Office of Kansas City

By: /s/Jason C. Amerine
Jason C. Amerine #50857
Castle Law Office of Kansas City
P: 816-842-6200
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Attorney for Debtor

Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing Answer to Motion to Deny Confirmation via electronic filing, on the following parties this January 4, 2006.

/s/Jason C. Amerine
Jason C. Amerine #50857

Mr. Richard V. Fink
Chapter 13 Trustee
818 Grand Blvd. Ste. 800
Kansas City, MO 64106